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Attorneys for Defendants and Counterclaim-Plaintiffs Hanmi USA, Inc., Hanmi Pharmaceutical Co., Ltd., Hanmi Fine Chemical Co., Ltd. and Hanmi Holdings Co., Ltd.

# IN THE UNITED STATES DISTRICT COURT THE DISTRICT OF NEW JERSEY

ASTRAZENECA AB, AKTIEBOLAGET HÄSSLE, ASTRAZENECA LP, KBI INC., and KBI-E INC.,

Plaintiffs and Counterclaim Defendants,

Civil Action No. 11-760 (JAP)(TJB)

V.

HANMI USA, INC., HANMI PHARMACEUTICAL CO., LTD., HANMI FINE CHEMICAL CO., LTD, and HANMI HOLDINGS CO., LTD.,

Defendants and Counterclaim Plaintiffs.

### **NOTICE OF MOTION**

#### TO: COUNSEL OF RECORD

PLEASE TAKE NOTICE that on a May 13, 2013 at 10:00 a.m. or as soon thereafter as counsel may be heard, Defendants Hanmi USA, Inc., Hanmi Pharmaceutical Co., Ltd., Hanmi Fine Chemical Co., Ltd. and Hanmi Holdings Co., Ltd. (collectively, "Hanmi"), will move before the Honorable Joel A. Pisano, U.S.D.J. at the U.S. District Court for the District of New Jersey, Clarkson S. Fisher Federal Bldg. & U.S. Courthouse, 402 East State Street, Trenton, New Jersey, for an order granting the following:

- 1. Hanmi's Motion *in Limine* No. 1(To Preclude Testimony of Judi Weissinger) and Motion to Strike Weissinger Report.
- 2. Hanmi's Motion *in Limine* No. 2 (To Preclude New Case Theories Never Disclosed In AstraZeneca's Contentions).
- 3. Hanmi's Motion *in Limine* No. 3 (To Preclude AstraZeneca From Attempting To Establish a Filing Date for the '192 Patent Earlier Than April 11, 1997).
- 4. Hanmi's Motion *in Limine* No. 4 (To Preclude AstraZeneca From Attempting To Introduce Evidence Alleging Invalidity or Unenforceability of Hanmi's Patents).
- 5. Hanmi's Motion in Limine No. 5 (To Preclude Testimony of Dr. Paul Bartlett).
- 6. Hanmi's Motion *in Limine* No .6 (To Preclude AstraZeneca From Attempting To Introduce Evidence On Theories Not In Its Contentions ).

PLEASE TAKE FURTHER NOTICE that in support of Hanmi's Motions in Limine,

Hanmi will rely upon the Memoranda of Law submitted with this Notice of Motion, and upon all pleadings and proceedings on file herein.

**PLEASE TAKE FURTHER NOTICE** that a proposed form of order granting Hanmi's motions is submitted herewith.

Dated: April 29, 2013 LITE DEPALMA GREENBERG, LLC

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